

## **REMARKS**

### **Claim rejections – 35 USC 102**

Claims 12, 13, 15, 17, 18 were rejected under 35 USC 102 as being unpatentable over Wagner.

Claims 12-14 have been amended to specifically claim a three pin diode structure. Wagner does not show a three pin diode structure, nor does it show a bipolar junction transistor with two base contacts. Instead, Wagner includes normal two pin diodes that are connected together. Diodes 21, 22, 23, 24 of Figure 3 are described with respect to Figure 2 (see column 7, lines 32-34, which refers to Figure 2). Figure 2 in turn states that diodes 23, 24 are usually small in size. In other words the diodes are referred to as individual diodes. Also, this section states that diodes 23, 24 are constructed similar to diodes 26, 27 (which are clearly shown in Figure 2 as alone-standing).

Furthermore, claim 13 specifies that the resistive element is part of the three pin diode. In contrast, R37 of Wagner is clearly alone-standing and not part of either of the diode pairs 21, 22, or 23, 24 (see resistor description in column 5, lines 54-55, and 62-64).

Regarding claims 15 and 17, the claims specify a bipolar junction transistor (BJT) with two base contacts. In other words they define a BJT with four contacts. No such structure is defined by the four separate diodes of Wagner.

### **Claim rejections – 35 USC 103**

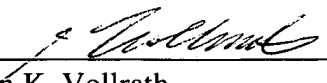
Claims 13, 16, 19 were rejected over Wagner.

In seeking support for the structural limitations in the diode structures, reference is made to the structure of the STSCR 30. However, the STSCR forms the ESD clamp in the circuit and is separate from the diodes connected to the Input. Thus the STSCR cannot be used to read structural limitations into the diodes of Wagner.

It is respectfully pointed out that none of the claims currently in the application are taught or suggested by Wagner. Early allowance of the claims is therefore requested.

Respectfully Submitted,

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